

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

CRISTINA FERNANDEZ CRUZ,

Plaintiff,

v.

NILDA J. MAYPA, MICHELLE BARBA
(AKA MICHELLE MAYPA), and
FERDINAND BARBA,

Defendants.

Case No. 1:13-cv-00862-CMH-IDD

DEFENDANTS' RULE 26(a)(3) PRETRIAL DISCLOSURES

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure and the Court's February 3, 2015 Scheduling Order, Defendants Nilda J. Maypa, Michelle Barba and Ferdinand Barba, through counsel, submit these pretrial disclosures of evidence they will or may present at trial, other than that used solely for impeachment.

I. Witness List

Defendants identify the following list of witnesses expected to be or who may be called.

A. Witnesses Expected To Be Called

1. Nilda Maypa
6528 Koziara Dr.
Burke, VA 22015
(703) 372-1588
[dealings with plaintiff Cristina Cruz over nearly six years from 2002 to 2008]
2. Ferdinand Barba
12190 Henderson Road
Clifton, VA 20124
(703) 830-9493
[dealings with plaintiff Cristina Cruz over nearly six years from 2002 to 2008]
3. Michelle Barba (also known as Michelle Maypa)
12190 Henderson Road
Clifton, VA 20124
(703) 830-9493
[dealings with plaintiff Cristina Cruz over nearly six years from 2002 to 2008]
4. Cherdie Barba- age 25 (DOB June 15, 1989)

12190 Henderson Road
Clifton, VA 20124
(703) 830-9493

[dealings with plaintiff Cristina Cruz over nearly six years from 2002 to 2008]

5. Christopher Barba-age 23 (DOB April 8, 1991)
12190 Henderson Road
Clifton, VA 20124
(703) 830-9493
[dealings with plaintiff Cristina Cruz over nearly six years from 2002 to 2008]
6. Caitlin Barba-age 22 (DOB September 6, 1992)
12190 Henderson Road
Clifton, VA 20124
(703) 830-9493
[dealings with plaintiff Cristina Cruz over nearly six years from 2002 to 2008]
7. Christian Barba – age 13 (DOB October 2, 2001)
12190 Henderson Road
Clifton, VA 20124
(703) 830-9493
[dealings with plaintiff Cristina Cruz over nearly six years from 2002 to 2008]
8. Cherrie Bernardez
713 E. Mountain Sage Dr.
Phoenix, Arizona 85048
[First employee who helped to care for older children when they were young]

B. Witnesses Who May Be Called

1. Donna Burke
4370 Valley Brook Place
White Plains, MD 20695
(703) 379-6020
[Office manager for Dr. George Gondor at Bradlee Family Health Center in Bradlee Medical Building in Alexandria Virginia for all the years that Michelle worked there]
2. Gemma Phelps
10626 Springmann Drive
Fairfax, VA 22030
(703) 865-8046
[Sister of Ferdinand Barba who frequently visited house or attended parties from 2002 through 2008]
3. Ofelia Barba
6019 Rose Hill Drive
Alexandria, VA 22310
(571) 242.7289
[Sister-in-law of Ferdinand Barba who frequently visited house or attended parties from 2002 through 2008]

4. Any witnesses identified by plaintiff Cristina Cruz.

II. Deposition Testimony

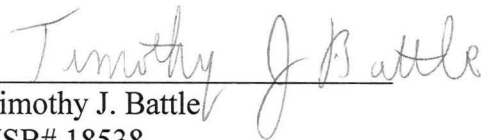
Defendants expect that all witnesses will be available to provide live testimony and it will not be necessary for any witness to testify through his or her deposition taken in this case. Defendants reserve the right to supplement this disclosure, within a reasonable period, if a witness becomes unavailable to provide live testimony. Insofar as Plaintiff designates witness testimony to be presented by deposition, Defendants reserve the right to introduce additional deposition testimony from the same witness or to call these witnesses for live testimony. Defendants reserve the right to introduce deposition testimony of any witnesses for impeachment.

III. Exhibit List

Defendants identify the following list of exhibits that they may introduce at trial. Defendants reserve the right to offer additional exhibits for impeachment.

1. Photographs numbered 1 to 37.
2. Copy of I-94 – showing two extensions of stay given to Cristina Cruz as a G-5 (domestic helper of an employee of an international organization) – and related passport documents.
3. October 29, 2002 memo from Human Resources Visa Services at World Bank re: G-5 visa renewal policy change.
4. Any exhibits identified by plaintiff Cristina Cruz.

Respectfully submitted,


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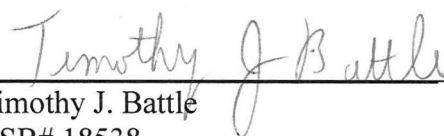
CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2015, an electronic copy of the foregoing was filed with the Clerk of the Court for the United States Court for the Eastern District of Virginia using the appellate CM/ECF system.

I further certify that all participants in this case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system and by serving a true copy of the foregoing to the addresses listed below:

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Respectfully submitted,



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